IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

MWK RECRUITING, INC. Plaintiff,

v.

EVAN P. JOWERS, YULIYA VINOKUROVA, ALEJANDRO VARGAS, and LEGIS VENTURES (HK) COMPANY LIMITED (aka Jowers / Vargas), Defendants.

EVAN P. JOWERS

Counterclaimant,

v.

MWK RECRUITING, INC., ROBERT E. KINNEY, MICHELLE W. KINNEY, RECRUITING PARTNERS GP, INC., KINNEY RECRUITING LLC, COUNSEL UNLIMITED LLC, and KINNEY RECRUITING LIMITED

Counter-defendants.

Civil Action No. 1:18-cv-00444

RESPONSE TO COURT ORDER (DKT #249)

Case 1:18-cv-00444-RP Document 253 Filed 01/15/21 Page 2 of 3

Pursuant to the Court's Order dated January 11, 2021 (Dkt. 249), the undersigned

requests that the Jowers' filing (Dkt. 246) be withdrawn. Mr. Jowers did not have any role in

directing or influencing the filing of any discovery motions subject to the Court's December 18,

2020 Order to Show Cause. (Dkt. 236.) Rather, counsel for Mr. Jowers bears complete

responsibility for filing the underlying discovery motions at issue and made the decision to file

every motion exercising its own independent judgment.

DATED: January 15, 2021

Respectfully submitted,

/s/ Robert Tauler By:

> Robert Tauler, Esq. Texas State Bar No. 24122095 rtauler@taulersmith.com Tauler Smith LLP 100 Congress Ave., Suite 2000 Austin, TX 78701

Telephone: (512) 456-8760

COUNSEL FOR DEFENDANT AND COUNTERCLAIMANT **EVAN P. JOWERS**

CERTIFICATE OF SERVICE

I hereby certify that, on January 15, 2021, a true and accurate copy of the foregoing document was served on all counsel of record via the Court's CM/ECF system.

/s/ Robert Tauler	
Robert Tauler	